

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION



AMY ELIZABETH CONNOR BOWEN, )  
 )  
 Plaintiff, ) Case No. 3-13-0414  
 ) Judge Trauger  
 vs. ) Magistrate Judge Bryant  
 )  
 BRAD DOUGLAS PAISLEY, *et al.*, )  
 )  
 Defendants. )  
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DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT

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Defendants Brad Paisley, Carrie Underwood, John Kelley Lovelace, Chris Dubois, Frank Rogers, Sea Gayle Music, LLC, EMI April Music Inc., and Sony Music Entertainment d/b/a Arista Nashville ("Defendants") respectfully move this Court, pursuant to Fed. R. Civ. P. 12(b)(6), to dismiss the Verified Complaint (the "Complaint") of Plaintiff Amy Elizabeth Connor Bowen for failure to state a claim upon which relief may be granted.

In support of the Motion to Dismiss, Defendants have filed a supporting Memorandum of Law, a Request for Judicial Notice, a Declaration of Jane G. Stevens, and a Motion for Leave of Court to Manually File a DVD of materials referenced in the Complaint.

Respectfully submitted,

/s/ Jane G. Stevens

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